

DeMaria, Eva

From: HeldtSheller, Stephanie <SHeldtSheller@nwpipe.com>
Sent: Monday, October 05, 2015 3:09 PM
To: ORR Jim
Cc: MCCLINCY Matt; poulsen.mike@deq.state.or.us; LIVERMAN Alex; THIESSEN Kenneth; ROMERO Mike; DeMaria, Eva; Sheldrake, Sean; Wray, Mike; 'Ken.Shump@CH2M.com'; Claudia Powers
Subject: RE: 138 NWP Revision of 8/31/2015 DEQ Comments for Source Control Evaluation
Attachments: RE: Meeting Comments and EPA Letter Review Schedule

Jim,

Thank you for your October 5, 2015 response. We remain unclear concerning your clarification of DEQ's Specific Comment 4 as follows:

- (a) You stated ***"Please address this comments [sic] in your response to DEQ No Further Action comments."*** What exactly is NWP supposed to address and when? Please refer to issues 1 and 2 in my email below.
- (b) You stated: ***"A response to this comment is not required to address the source control comments."*** First, if the comment addresses a Site-Wide No Further Action determination (NFA), why is it included in DEQ's response to the source control decision? Second, do you mean that NWP does not need to address the DEQ Specific Comment 4 (second part) at all? What does NWP need to do to satisfy DEQ's comment?
- (c) You stated ***"DEQ, at your request has separated the comments for source control and No Further Action. I will provide a schedule for DEQ No Further Action comments by the end of the day October 8th."*** NWP has not requested any specific comments/feedback from the DEQ regarding the NFA. As recently as my 08/25/15 email to you (attached), we state that NWP's top priority is a Source Control determination. Copied and pasted from the attached email: *"For NWP, the most important action by DEQ is the Source Control Decision. This is our top priority; our main focus. If the site-wide NFA review is slowing the Source Control Decision process, we respectfully ask to please set it aside and focus on the Source Control process."* If the DEQ NFA slows down the Portland Harbor Source Control project, we will defer any NFA discussion until after our site has received a Source Control Determination from the DEQ. Please be advised, despite NWP's use of DEQ's definitions of "NFA" and "Source Control Determination," NWP still expects the Source Control Determination by DEQ to confirm that no further source control action is required at the NWP site.

Thank you,
Steph.

Stephanie Heldt-Sheller, CHMM

Corporate Environmental Manager

Northwest Pipe Company | 12005 N. Burgard Rd. | Portland, OR 97203 USA

Direct (503) 382 2324 | Cell (419) 283 1890 | Fax (503) 382 2327

From: ORR Jim [<mailto:orr.jim@deq.state.or.us>]
Sent: Monday, October 05, 2015 12:00 PM
To: HeldtSheller, Stephanie
Cc: MCCLINCY Matt; POULSEN Mike; LIVERMAN Alex; THIESSEN Kenneth; ROMERO Mike; 'DeMaria, Eva'; Sheldrake, Sean; Wray, Mike; 'Ken.Shump@CH2M.com'; Claudia Powers
Subject: RE: 138 NWP Revision of 8/31/2015 DEQ Comments for Source Control Evaluation

Stephanie, Please see my responses below.

Thank You

Jim Orr
DEQ Northwest Region
700 NE Multnomah St. Suite 600
Portland, Oregon 97232
503-229-5039

From: HeldtSheller, Stephanie [<mailto:SHeldtSheller@nwpipe.com>]

Sent: Monday, October 05, 2015 11:02 AM

To: ORR Jim

Cc: MCCLINCY Matt; POULSEN Mike; LIVERMAN Alex; THIESSEN Kenneth; ROMERO Mike; 'DeMaria, Eva'; Sheldrake, Sean; Wray, Mike; 'Ken.Shump@CH2M.com'; Claudia Powers

Subject: RE: 138 NWP Revision of 8/31/2015 DEQ Comments for Source Control Evaluation

Hi Jim,

And thank you for the revised comments. The letter states that clarifications are in italics. For revised Specific Comment 4 (second part), we asked for DEQ to please point out the statement in the Report, that triggered this comment. Since that was not provided by the DEQ, we are not sure what the problem is that warranted this DEQ comment. Could you please assist us with the remaining issues below?

Specific Comment 4 (second part) of the DEQ October 1, 2015 revised comments reads as follows:

Section 6.3.1.4 Conclusions for Human Health Risk Screening

Section 6.3.1.3 Human Health Risk Screening Results

Conclusions regarding risks from human exposure to zinc cannot be used as the basis for drawing ecological risk conclusions. Aquatic ecological screening levels for zinc are considerably lower than human health screening levels. Screening should be conducted for both human health and ecological receptors using the appropriate screening values. *The site maximum concentration should be compared with background UPL. This comment will also be addressed in pending No Further Action DEQ comments.*

The issues with this comment are:

- (1) Section 6.3.1.3 does not draw ecological risk conclusions, or discuss aquatic ecological screening levels for zinc. Did you mean to withdraw these statements that are not in italics? Or is there still some issue here that I am missing? If there is an issue, could you please describe what DEQ needs from NWP to satisfy this statement in the comment?
- (2) Section 6.3.1.3 refers to tables 6-9 and 6-10, which already do compare zinc max concentrations, as well as all metals max concentrations, to background UPL's from the "Development of Oregon Background Metals Concentrations in Soil," Table 3, Regional Background Calculations for Metals (attached for your quick reference). Is there something NWP is missing in the tables that DEQ needs in order to satisfy this comment?
- (3) The revised comment states that "This comment will also be addressed in pending No Further Action DEQ comments." When should NWP expect to see the No Further Action DEQ comments?

[ORR Jim]

[ORR Jim] Please address this comments in your response to DEQ No Further Action comments.

A response to this comment is not required to address the source control comments.

DEQ, at your request has separated the comments for source control and No Further Action.

I will provide a schedule for DEQ No Further Action comments by the end of the day October 8th.

Once we get these lingering items rectified, NWP will be able to provide DEQ with a timeline as to when our responses and revised pages to the Report will be provided. DEQ timeliness would be appreciated.

[ORR Jim]

Please provide a timeline for your response to DEQ Source Control comments. Thanks

Thank you,
Steph.

Stephanie Heldt-Sheller, CHMM

Corporate Environmental Manager

Northwest Pipe Company | 12005 N. Burgard Rd. | Portland, OR 97203 USA

Direct (503) 382 2324 | Cell (419) 283 1890 | Fax (503) 382 2327

From: ORR Jim [<mailto:orr.jim@deg.state.or.us>]

Sent: Thursday, October 01, 2015 10:38 AM

To: Wray, Mike; 'Ken.Shump@CH2M.com'; HeldtSheller, Stephanie; Claudia Powers

Cc: MCCLINCY Matt; POULSEN Mike; LIVERMAN Alex; THIESSEN Kenneth; ROMERO Mike; 'DeMaria, Eva'; Sheldrake, Sean

Subject: 138 NWP Revision of 8/31/2015 DEQ Comments for Source Control Evaluation

Attached is a revision to DEQ's 8/31/2015 comments for the NW Pipe Source Control Evaluation.
Please contact me if you have questions.

Thank You

Jim Orr

DEQ Northwest Region

700 NE Multnomah St. Suite 600

Portland, Oregon 97232

503-229-5039